

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PANTHER CREEK MEDICAL CENTER,
P.A.,

Plaintiff,

V.

VILLAGE PRACTICE MANAGEMENT \$
COMPANY LLC; VILLAGE PRACTICE \$
MANAGEMENT COMPANY OF HOUSTON \$
LLC; and VILLAGEMD OF SOUTHEAST \$
TEXAS, PA D/B/A VILLAGE MEDICAL, \$

Defendants.

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Civil Action No. 4:20-cv-2358

## Jury Trial Demanded

**JOINT MOTION TO STAY AND NOTICE OF SETTLEMENT**

Plaintiff Panther Creek Medical Center, P.A. (“Plaintiff”) and Defendants Village Practice Management Company LLC, Village Practice Management Company of Houston LLC, and VillageMD of Southeast Texas, PA d/b/a Village Medical (collectively “Defendants”) file this Joint Motion to Stay All Deadlines and Notice of Settlement. Plaintiff and Defendants have reached a settlement in principle in the matter, and expect to finalize the agreement within the stay requested.

In furtherance of the impending settlement agreement, the parties move the Court to stay all deadlines and events in the matter for thirty (30) days.

WHEREFORE, the parties respectfully request that the Court grant this joint motion and stay all applicable deadlines and events for thirty (30) days.

Date: October 1, 2020

Respectfully submitted,

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| <p><u>/s/ Paul R. Morico</u><br/>Paul R. Morico Lead Attorney<br/>Texas Bar No. 00792053<br/>BAKER BOTTS L.L.P.<br/>One Shell Plaza<br/>910 Louisiana Street<br/>Houston, Texas 77002<br/>Tel.: (713) 229-1732<br/>Fax: (713) 229-7732<br/>Paul.morico@bakerbotts.com</p> <p>Elizabeth K. Rucki Texas Bar No.<br/>24060651 SDTX Bar No. 113507<br/>BAKER BOTTS L.L.P.<br/>2001 Ross Avenue<br/>Suite 900<br/>Dallas, TX 75201-2980<br/>Tel.: (214) 953-6926<br/>Fax: (214) 661-4926<br/>elizabeth.rucki@bakerbotts.com</p> <p>Beverly A. Berneman (Pro Hac Vice)<br/>Illinois Bar No. 6189418<br/>Ashley L. Orler (Pro Hac Vice)</p> <p><b><i>Attorneys for Defendants</i></b></p> | <p><u>/s/ Califf T. Cooper</u><br/>Tammy J. Dunn<br/>State Bar No. 24045660<br/>SDTX No. 562006<br/>Dunn@oshaliang.com</p> <p>Califf T. Cooper<br/>State Bar No. 24055345<br/>SDTX No. 713685<br/>Cooper@oshaliang.com</p> <p>Keelin A. Hargadon<br/>State Bar No. 24087668<br/>SDTX No. 2708053<br/>Hargadon@oshaliang.com</p> <p>OSHA LIANG LLP<br/>909 Fannin Street, Suite 3500<br/>Houston, Texas 77010<br/>Tel.   Fax: 713.228.8600   713.228.8778</p> <p><b><i>Attorneys for Plaintiff, Panther Creek<br/>Medical Center P.A</i></b></p> |
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record via the Court's ECF system, on this the 1st day of October, 2020.

/s/ Califf T. Cooper